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December 15, 2005

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket No. 2002N-0237, Substances Prohibited From Use in Animal Food or Feed

To Whom It May Concern:

This letter is in response to the proposed changes to the 1997 ruminant feed ban. I am the General Manager of Baker Commodities Inc, Billerica Mass rendering company. I am very concerned about the new proposed rule change as I feel that we are already doing enough to prevent BSE from becoming a major problem in this country. As you are more then aware of we have tested over 550,000 high risk animals in this country over the last 18 months with only one animal testing positive and there are very serious question even concerning the positive test. We as a company have participated in this testing program with the USDA and feel very sure that we have done a very good job with no positive results to date.

I think to add more unnecessary restriction will only create more hardship to the Rendering industry as well as the cattle industry in order to only prove what we already know is **WE DO NOT HAVE BSE** in this country. This purposed rule change will cost companies and consumers more money and will cause a number of good companies to close.

This rule change will not prevent any cases of BSE because we do not have BSE in this country. To make rule changes just to please other countries makes no sense to me.

To allow this material to be disposed of in any other place such as Composting and landfill makes no sense at all. When that happens scavengers such as coyotes, rats and other animals will spread this material all over the area causing a higher risk to human health; it will contaminate our drinking water and kill fish and spared diseases and I have to ask why we are going to do that.

Finally, I feel very strongly that all of the prevented measures we have in place now are working very well (as our testing has proven) and there is no need for any further changes to the original 1997 feed ban.

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Thank You

Joseph Huelsman

General Manager

Baker Commodities Inc

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